

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

BERNADETTE WILLIAMS, IVAN  
SERRATA REYES, ROSILYN WILSON,  
HAUNANIMAE CERVANTES-WHITE,  
MARIA MUNOZ, TRACY OBRIEN,  
KIMBERLY BENSON, ROY TUINSTRAN,  
MICHELLE SNYDER, PATRICIA  
COUCH, SABRINA CAPERS, WILLIAM  
ROSS DEAN, RICHARD DACHEFF,  
KRISTY KELLER, JASIMEN  
HERNANDEZ, EDGAR FLORIAN,  
MICHAEL GROSSBERG, MERRILL  
LOVE, DIANE NEWKIRK, SANDRA  
SMILING, DAVEY JOHNSTON,  
CYNTHIA ROEMER, ROQUE  
ESPINOZA, DJ NEILL, TYSON  
DEWSNUP, and DEIRDRE PALMER, on  
behalf of themselves and all others  
similarly situated,

Plaintiffs,

v.

STATE FARM MUTUAL AUTOMOBILE  
INSURANCE CO.,

Defendant.

Case No.: 1:22-cv-01422

Judge Virginia M. Kendall

**JOINT MOTION TO VACATE AUGUST 8, 2024 PRESENTMENT HEARING  
AND TO ENTER BRIEFING SCHEDULE**

Plaintiffs and Defendant State Farm Mutual Automobile Insurance Company (“State Farm”) (collectively, the “Parties”) respectfully request that the Court to vacate the August 8, 2024 presentment hearing on Plaintiffs’ Motion for Leave to File a Second Amended Class Action Complaint (“Motion”) and enter the Parties’ proposed briefing schedule:

1. Plaintiffs filed their Motion on July 26, 2024. (ECF No. 205.) Plaintiffs noticed their Motion for presentment for August 8, 2024.

2. After Plaintiffs’ filing, the Parties conferred and agreed to the following briefing schedule for the Motion: State Farm will file its Opposition to Plaintiffs’ Motion no later than August 6, 2024, and Plaintiffs will file their Reply in Support of Plaintiffs’ Motion no later than August 27, 2024.

3. The Parties agreed to the proposed briefing schedule to help accommodate counsel for State Farm’s conflict with the August 8 presentment date, as well as all counsels’ professional and personal commitments during the month of August, including several pre-planned family vacations.

4. The Parties’ proposed briefing schedule will ensure briefing on Plaintiffs’ Motion is completed expeditiously, and it will not unduly delay resolution of the Motion.

Accordingly, the Parties respectfully request that the Court vacate the August 8, 2024 presentment hearing and enter the Parties’ proposed briefing schedule.

Dated: July 31, 2024

Respectfully submitted,

s/ Scott A. George

**SHAMIS & GENTILE, P.A.**

Andrew J. Shamis, Esq.  
ashamis@shamisgentile.com  
Edwin E. Elliott  
edwine@shamisgentile.com  
14 NE 1st Avenue, Suite 705  
Miami, Florida 33132  
Telephone: 305-479-2299

**EDELSBERG LAW, P.A.**

Scott Edelsberg\*  
scott@edelsberglaw.com  
20900 NE 30th Ave., Suite 417  
Aventura, FL 33180  
Office: (786) 289-9471  
Direct: (305) 975-3320

**SEEGER WEISS LLP**

Christopher A. Seeger\*  
Christopher L. Ayers\*  
55 Challenger Road, 6th FL  
Ridgefield Park, NJ 07660  
Telephone: (973) 639-9100  
Facsimile: (973) 639-8656  
cseeger@seegerweiss.com  
cayers@seegerweiss.com

**SEEGER WEISS LLP**

Scott A. George  
325 Chestnut Street, Suite 917  
Philadelphia, PA 19106  
Telephone: (215) 564-2300  
Facsimile: (215) 851-8029  
sgeorge@seegerweiss.com

*Counsel for Plaintiffs and the Proposed  
Class*

*\* Admitted pro hac vice*

s/ Eric L. Robertson

Joseph P. Carlasare  
AMUNDSEN DAVIS LLC  
150 N. Michigan Ave., Suite 3300  
Chicago, IL 60601  
Phone: 312.894.3200  
Email: jcarlasare@amundsendavislaw.com

Peter W. Herzog III (*pro hac vice*)  
Kaleb Gregory (*pro hac vice*)  
WHEELER TRIGG O'DONNELL LLP  
211 N. Broadway, Suite 2825  
St. Louis, MO 63102  
Phone: 314.326.4129  
Email: pherzog@wtotrial.com  
gregory@wtotrial.com

Eric L. Robertson (*pro hac vice*)  
Thomas C. Dec (*pro hac vice*)  
WHEELER TRIGG O'DONNELL LLP  
370 17th Street, Suite 4500  
Denver, CO 80202  
Phone: 303.244.1842  
Email: robertson@wtotrial.com  
dec@wtotrial.com

*Attorneys for Defendant State Farm Mutual  
Automobile Insurance Co.*